

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

This document relates to:

*Chang Don Kim, et al. v. Islamic Republic of Iran*, No. 1:18-cv-11870 (GBD) (SN)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Plaintiffs in the above-referenced matter, by undersigned counsel and in accordance with F.R.C.P. 60(a), respectfully request that this Court grant Plaintiffs' Motion for Corrections to Partial Final Judgment at ECF No. 5049. No adverse parties have appeared in this proceeding, and the Clerk issued a Certificate of Default on August 13, 2019. In support of this motion, Plaintiffs submit a Memorandum of Law, Declaration of Jerry S. Goldman, Esq., and Proposed Order.

Dated: New York, New York  
May 5, 2022

Respectfully submitted,

/s/ Jerry S. Goldman  
ANDERSON KILL P.C.  
Jerry S. Goldman, Esq.  
Bruce E. Strong, Esq.  
Alexander Greene, Esq.  
1251 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 279-1000  
Fax: (212) 278-1733  
Email: [jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)  
[bstrong@andersonkill.com](mailto:bstrong@andersonkill.com)  
[agreene@andersonkill.com](mailto:agreene@andersonkill.com)  
*Attorneys for Plaintiffs*